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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

TRUSTEE'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

Under the Order Establishing a Schedule for Limited Discovery and Briefing on the Profit Withdrawal Issue, entered by the United States Bankruptcy Court for the Southern District of New York on June 24, 2015 (the "Profit Withdrawal Scheduling Order"), ECF No. 10266, Irving H. Picard (the "Trustee"), as Trustee for the liquidation of the business of Bernard L.

Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff, by and through his counsel Baker & Hostetler LLP, hereby requests that accountholders identified on Exhibit A, Column 2 and accountholders identified on Exhibit B, Column 2 produce documents responsive to these requests (the “Document Requests”) to the offices of Baker & Hostetler LLP, c/o Nkosi Shields, 45 Rockefeller Plaza, New York, New York 10111, no later than November 2, 2015, as set forth in the Profit Withdrawal Scheduling Order, ECF No. 10266.

DEFINITIONS

1. The rules of construction and definitions in Local Rule 26.3, as adopted in Rule 7026-1 of the Local Bankruptcy Rules, are incorporated by reference. All defined terms, including those defined in Local Rule 26.3, are capitalized herein.
2. “Account” refers to a (a) BLMIS Direct Account, identified on Exhibit B, column 1; or (b) BLMIS Indirect Account, identified on Exhibit A, column 1.
3. “Accountholder” means accountholders identified on Exhibit A, column 2 and Exhibit B, column 2.
4. “BLMIS” means Bernard L. Madoff Investment Securities LLC, Madoff Securities International Ltd. (“MSIL”), Bernard L. Madoff, Ruth Madoff, and all affiliated persons and entities, including, but not limited to, any officers, directors, agents, representatives, employees, partners, parent companies, subsidiaries, predecessor or successor and related entities, and affiliates of the above specifically identified Person and entities.
5. “Concerning” means relating to, referring to, describing, evidencing, embodying, constituting, or referencing.

6. "You" and "Your" means Accountholders identified on Exhibit A, column 2 and Exhibit B, column 2.

7. "BLMIS Direct Accounts" refers to accounts for which customer statements reflect profit withdrawal transactions.

8. "BLMIS Indirect Accounts" refers to accounts that received inter-account transfers from BLMIS Direct Accounts.

INSTRUCTIONS

Federal Rules of Civil Procedure 26-37, made applicable to this proceeding pursuant to Federal Rules of Bankruptcy Procedure 7026-7037, are hereby incorporated by reference and apply to each of the following instructions:

1. All Documents shall be identified by the Request(s) to which they are primarily responsive or be produced as they are maintained in the usual course of business.

2. Produce all Documents and all other materials described below in Your actual or constructive possession, custody, or control, including in the possession, custody, or control that, wherever those Documents and materials are maintained, including on personal computers, PDAs, wireless devices, or web-based email systems such as Gmail, Yahoo, etc.

3. You must produce all Documents in Your possession, custody, or control, whether maintained in electronic or paper form and whether located on hardware owned and maintained by You or hardware owned and/or maintained by a third party that stores data on Your behalf. You must produce all such Documents even if they were deleted or in draft form. Without limitation, hardware where such data may be stored includes: servers; desktop, laptop, or tablet computers; cell and smart phones; PDA devices; scanners, fax machines, and copying machines; and mobile storage devices, such as thumb or external hard drives. Electronically stored Documents include any computerized data or content stored on electromagnetic media.

Without limitation, types of electronically stored Documents include email, voicemail, instant messages, intranet and internet system data, telephone and cellular telephone calling records, data compilations, spreadsheets, word processing Documents, images, databases, digital photocopier memory, and any other information stored in memory storage devices.

4. Produce the original or duplicate, as such terms are defined by Rule 1001 of the Federal Rules of Evidence, of each Document requested together with all non-identical copies and drafts of that Document. If a duplicate is produced, it should be legible and bound or stapled in the same manner as the original.

5. Documents not otherwise responsive to these Requests should be produced: (i) if such Documents mention, discuss, refer to, explain, or concern one or more Documents that are called for by these Requests; (ii) if such Documents are attached to, enclosed with, or accompany Documents called for by these Requests; or (iii) if such Documents constitute routing slips, transmittal memoranda or letters, comments, evaluations, or similar materials.

6. Documents attached to each other should not be separated; separate Documents should not be attached to each other.

7. Documents should include all exhibits, appendices, linked Documents, or otherwise appended Documents that are referenced in, attached to, included with, or are a part of the requested Documents.

8. If a Request calls for information concerning a redemption, or withdrawal from a BLMIS account, You must include Documents that reflect the account name and number for the account the funds were transferred from and to, method of transfer (i.e., wire, check, etc.), date of, amount and the reason for the redemption, or withdrawal.

9. If any Document, or any part thereof, is not produced based on a claim of attorney-client privilege, work-product protection, or any other privilege, then in answer to such Request or part thereof, for each such Document, You must:

- a. Identify the type, title and subject matter of the Document;
- b. state the place, date, and manner of preparation of the Document;
- c. Identify all authors, addressees, and recipients of the Document, including information about such Persons to assess the privilege asserted; and
- d. Identify the legal privilege(s) and the factual basis for the claim.

10. Documents should not contain redactions unless such redactions are made to protect information subject to the attorney-client privilege and/or work product doctrine. In the event any Documents are produced with redactions, a log setting forth the information requested in Instruction 9 above must be provided.

11. To the extent a Document sought herein was at one time, but is no longer, in Your actual or constructive possession, custody, or control, state whether it: (i) is missing or lost; (ii) has been destroyed; (iii) has been transferred to others; and/or (iv) has been otherwise disposed of. In each instance, identify the Document, state the time period during which it was maintained, state the circumstance and date surrounding authorization for such disposition, identify each Person having knowledge of the circumstances of the disposition, and identify each Person who had possession, custody, or control of the Document. Documents prepared prior to, but which relate or refer to, the time period covered by these Requests are to be identified and produced.

DOCUMENTS REQUESTED

1. All Documents concerning Your BLMIS Direct and BLMIS Indirect Accounts.
2. All Documents evidencing Your withdrawal of funds from BLMIS.

3. All Documents concerning any BLMIS accounts in which You invested, including the Accounts.
4. All Documents evidencing Your request for funds from BLMIS.
5. All Documents concerning profit withdrawal transactions in Your Accounts.
6. All Documents relating to transfers between BLMIS Accounts.

MANNER OF PRODUCTION

1. All Documents produced to the Trustee shall be provided in either native file (“native”) or single-page 300 dpi-resolution group IV TIF format (“tiff”) format as specified below, along with appropriately formatted industry-standard database load files, and accompanied by true and correct copies or representations of unaltered attendant metadata. Where Documents are produced in tiff format, each Document shall be produced along with a multi-page, Document-level searchable text file (“searchable text”) as rendered by an industry-standard text extraction program in the case of electronic originals, or by an industry-standard Optical Character Recognition (“ocr”) program in the case of scanned paper Documents. Searchable text of Documents shall not be produced as fielded data within the “.dat file” as described below.

2. Database load files and production media structure: Database load files shall consist of: (i) a comma-delimited values (“.dat”) file containing: production Document identifier information, data designed to preserve “parent and child” relationships within document “families,” reasonably accessible and properly preserved metadata (or bibliographic coding in the case of paper Documents), custodian or Document source information; and (ii) an Opticon (“.opt”) file to facilitate the loading of tiff images. Load files should be provided in a root-level folder named “Data,” images shall be provided within a root level “Images” folder containing reasonably structured subfolders, and searchable text files shall be provided in a single root-level

“Text” folder. If any of the Documents produced in response to these requests are designated as confidential pursuant to the Protective Order, entered on June 6, 2011 in the matter of *Securities Investor Protection Corporation v. Bernard L. Madoff Investment Securities LLC, et al.*, Adv. Pro. No. 08-01789 (SMB) (the “Protective Order”), in addition to marking the Documents with the brand “CONFIDENTIAL” or branding the media with the word “CONFIDENTIAL,” also include a Confidential field within the load file, with a “yes” or “no” indicating whether the Document has been designated as confidential, as well as native file loading/linking information (where applicable).

3. Electronic Documents and data, generally: Documents and other responsive data or materials created, stored, or displayed on electronic or electro-magnetic media shall be produced in the order in which the Documents are or were stored in the ordinary course of business, including all reasonably accessible metadata, custodian or Document source information, and searchable text as to allow the Trustee, through a reasonable and modest effort, to fairly, accurately, and completely access, search, display, comprehend, and assess the Documents’ true and original content.

4. Emails and attachments, and other email account-related Documents: All Documents and accompanying metadata created and/or stored in the ordinary course of business within commercial, off-the-shelf email systems including but not limited to Microsoft Exchange™, Lotus Notes™, or Novell Groupwise™ shall be produced in tiff format, accompanying metadata, and searchable text files or, alternately, in a format that fairly, accurately, and completely represents each Document in such a manner as to make the Document(s) reasonably useable, manageable, and comprehensible by the Trustee.

5. Documents and data created or stored in or by structured electronic databases:

With the exclusion of email and email account-related Documents and data, all Documents and accompanying metadata created and/or stored in structured electronic databases or files shall be produced in a format that enables the Trustee to reasonably manage and import those Documents into a useable, coherent database. Documents must be accompanied by reasonably detailed documentation explaining the Documents' content and format including but not limited to data dictionaries and diagrams. Some acceptable formats, if and only if provided with definitive file(s), table(s), and field level schemas include:

- a. XML format file(s);
- b. Microsoft SQL database(s);
- c. Access database(s); and/or
- d. Fixed or variable length ASCII delimited files.

6. Spreadsheets, multimedia, and non-standard file types: All Documents generated or stored in software such as Microsoft Excel or other commercially available spreadsheet programs, as well as any multimedia files such as audio or video, shall be produced in their native format, along with an accompanying placeholder image in tiff format indicating a native file has been produced. A "Nativelink" entry shall be included in the .dat load file indicating the relative file path to each native file on the production media. To the extent the party has other file types that do not readily or easily and accurately convert to tiff and searchable text, the party may elect to produce those files in native format subject to the other requirements listed herein. Native files may be produced within a separate root-level folder structure on deliverable media entitled "Natives."

7. "Other" electronic Documents: All other Documents and accompanying metadata and embedded data created or stored in unstructured files generated by commercially available

software systems (excluding emails, structured electronic databases, spreadsheets, or multimedia) such as, but not limited to, word processing files (such as Microsoft Word), image files (such as Adobe .pdf files and other formats), and text files shall be produced in tiff and searchable text format in the order the files are or were stored in the ordinary course of business.

8. Paper Documents: Documents originally created or stored on paper shall be produced in tiff format. Relationships between Documents shall be identified within the Relativity .dat file utilizing document identifier numbers to express parent document/child attachment boundaries, folder boundaries, and other groupings. In addition, the searchable text of each Document shall be provided as a multi-page text file as provided for by these requests.

Dated: New York, New York
October 7, 2015

/s/Nkosi Shields

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and Bernard L. Madoff*

Exhibit A

Column 1	Column 2	Column 3	Column 4
Indirect BLMIS Account No.	Indirect BLMIS Account Name	BLMIS Related Direct Eligible Account No.	BLMIS Related Direct Account Name
1A0083	ACCU PLAN EMPLOYEES' PROFIT SHARING TRUST	1A0004	ACCU PLAN EMPLOYEES' PROFIT SHARING TRUST C/O NEIL FRIEDMAN
1B0156	AARON BLECKER REV TRUST U/A/D 3/15/07	100124	AVELLINO & ALPERN
		1B0022	AARON BLECKER
		1B0023	ARTHUR BLECKER & SOFIE BLECKER J/T WROS
1B0157	ARTHUR BLECKER & SOFIE BLECKER J/T WROS	100124	AVELLINO & ALPERN
		1B0023	ARTHUR BLECKER & SOFIE BLECKER J/T WROS
1C1229	CHALEK ASSOCIATES LLC C/O MORTON CHALEK	100324	SOL CHALEK
		1C1041	CHALEK EQUITIES INC
		1C1042	CHALEK INVESTMENT PARTNERSHIP ATTN: MITCHEL CHALEK
		1C1043	ALVERN CHALEK TRUST U/A/D 6/29/89
		1C1044	MORTON CHALEK
		1S0170	SCHUPAK INVESTMENT C/O HOWARD M SCHUPAK, GEN PART
1CM682	BETH FELDMAN	1C0007	BERNARD L MADOFF C & M TRADING #7
1CM806	EVELYN BEREZIN WILENITZ	1C0000	BERNARD L MADOFF C & M INTERIM MONEY MKT FUND
		1C0007	BERNARD L MADOFF C & M TRADING #7
1CM837	TRUST U/ART FOURTH O/W/O ISRAEL WILENITZ EVELYN BEREZIN	1C0000	BERNARD L MADOFF C & M INTERIM MONEY MKT FUND
		1C0007	BERNARD L MADOFF C & M TRADING #7
1E0143	BARBARA ENGEL	100124	AVELLINO & ALPERN
		1A0028	WILLIAM ALPERN TRUST
		1E0111	BARBARA ENGEL
1F0092	FRIEDA FRESHMAN TRUSTEE WALTER FRESHMAN TRUST "A" 12/31/92	1F0044	WALTER FRESHMAN

Column 1	Column 2	Column 3	Column 4
Indirect BLMIS Account No.	Indirect BLMIS Account Name	BLMIS Related Direct Eligible Account No.	BLMIS Related Direct Account Name
1F0093	FRIEDA FRESHMAN TRUSTEE FRIEDA FRESHMAN REV TRUST 12/31/92	1F0044	WALTER FRESHMAN
		1F0070	FRIEDA FRESHMAN
1F0106	HOWARD L FRUCHT AND CAROLYN FRUCHT REV TRUST	1F0058	CAROLYN FRUCHT
		1F0059	HOWARD L FRUCHT M D
1F0116	CAROL FISHER	1F0017	LEO FISHER AND DOROTHY FISHER J/T WROS 260 TUSCANY E
		1H0040	DORIS HOROWITZ AS TRUSTEE U/A/D 10/4/89
1F0123	ADELE FOX TRUSTEE UDT 3/5/90 F/B/O ADELE FOX	1F0032	ADELE FOX AND RONNI FOX HARRELL J/T WROS
		1F0033	ADELE FOX TRUSTEE U D T 3/5/90 F B O ADELE FOX
1H0099	BARBARA KOTLIKOFF HARMAN RIVERMERE ALGER COURT APT 4B	1H0008	BARBARA KOTLIKOFF HARMAN RIVERMERE ALGER COURT APT4B
		1H0009	MR HARRY J HARMAN
		1H0010	TOBY HARMAN
1H0161	THE HARNICK BROTHERS PARTNERSHIP C/O GARY HARNICK	1B0066	SYLVIA H BRODSKY
1H0166	BENJAMIN T HELLER IRREVOCABLE TRUST	1H0022	BEN HELLER
1K0118	DAVID SHAPIRO NOMINEE 4	1K0011	DAVID SHAPIRO NOMINEE 4
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
1K0206	SAULIUS KAJOTA	1R0027	NICOLE RICHARDSON
1L0146	CAREN LOW	1L0045	CAREN LOW
		1L0046	GARY LOW
1L0147	FRIEDA LOW	1L0047	ROBERT K LOW
		1L0069	FRIEDA LOW
1L0149	ROBERT K LOW	1L0047	ROBERT K LOW
1M0101	RONA MAST	100124	AVELLINO & ALPERN
		1C1092	CLAIRE COVNER REVOCABLE LIVING TRUST
		1M0027	RONA MAST & JEFF MAST J/T WROS

Column 1 **Column 2** **Column 3** **Column 4**

Indirect BLMIS Account No.	Indirect BLMIS Account Name	BLMIS Related Direct Eligible Account No.	BLMIS Related Direct Account Name
1M0105	EDWIN MICHALOVE	100813	IRWIN K HOROWITZ
		1G0036	MURRAY GOLD AS TRUSTEE U/A/D 08/08/90
		1H0040	DORIS HOROWITZ AS TRUSTEE U/A/D 10/4/89
		1M0037	EDWIN MICHALOVE
1P0105	LAUREL PAYMER	1J0006	JG KNITS INC C/O M WEINGARTEN
		1W0064	TRUST U/W/O MARCUS WEINGARTEN F/B/O FELICE WEINGARTEN C/O ROBERT DAVID WEINGARTEN
1R0123	BARBARA ROTH & MARK ROTH J/T WROS	1R0043	BARBARA ROTH & MARK ROTH J/T WROS
		1R0044	BARBARA ROTH & MARK ROTH J/T WROS
1R0133	THERESA R RYAN LAWRENCE J RYAN TRUSTEES U/D/T 11/20/91	100124	AVELLINO & ALPERN
		101846	EDWARD L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101847	DANIEL L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101908	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL C/O ZRAICK & NAHAS
		1A0045	AVELLINO & BIENES C/O FRANK AVELLINO
		1H0023	FREDERICK P HELLER
		1R0072	LAWRENCE J RYAN & THERESA R RYAN TRUSTEES U/D/T 11/20/91
		1R0073	THERESA R RYAN LAWRENCE J RYAN TRUSTEES U/D/T 11/20/91
		1R0083	DANIEL RYAN
		H01909	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL 2 C/O ZRAICK & NAHAS
1R0134	DANIEL RYAN	100124	AVELLINO & ALPERN
		101846	EDWARD L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101847	DANIEL L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT

Column 1	Column 2	Column 3	Column 4
Indirect BLMIS Account No.	Indirect BLMIS Account Name	BLMIS Related Direct Eligible Account No.	BLMIS Related Direct Account Name
		101908	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL C/O ZRAICK & NAHAS
		1A0045	AVELLINO & BIENES C/O FRANK AVELLINO
		1H0023	FREDERICK P HELLER
		1R0072	LAWRENCE J RYAN & THERESA R RYAN TRUSTEES U/D/T 11/20/91
		1R0073	THERESA R RYAN LAWRENCE J RYAN TRUSTEES U/D/T 11/20/91
		1R0083	DANIEL RYAN
		H01909	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL 2 C/O ZRAICK & NAHAS
1R0171	LAWRENCE J.RYAN BY-PASS TRUST UNDER DECLARATION OF TST DTD NOV 20,1991 THERESA R. RYAN	100124	AVELLINO & ALPERN
		101846	EDWARD L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101847	DANIEL L RYAN CUST LAURENCE J RYAN IN TST UNDER CALIF GIFT TO MINORS ACT
		101908	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL C/O ZRAICK & NAHAS
		1A0045	AVELLINO & BIENES C/O FRANK AVELLINO
		1H0023	FREDERICK P HELLER
		1R0072	LAWRENCE J RYAN & THERESA R RYAN TRUSTEES U/D/T 11/20/91
		1R0073	THERESA R RYAN LAWRENCE J RYAN TRUSTEES U/D/T 11/20/91
		1R0083	DANIEL RYAN
		H01909	GEORGE SCHEER AND CHARLOTTE SCHEER SPECIAL 2 C/O ZRAICK & NAHAS
1S0260	SCHUPAK INVESTMENT C/O HOWARD M SCHUPAK, GEN PART	100324	SOL CHALEK
		1C1041	CHALEK EQUITIES INC
		1C1042	CHALEK INVESTMENT PARTNERSHIP ATTN: MITCHEL CHALEK
		1C1043	ALVERN CHALEK TRUST U/A/D 6/29/89

Column 1	Column 2	Column 3	Column 4
Indirect BLMIS Account No.	Indirect BLMIS Account Name	BLMIS Related Direct Eligible Account No.	BLMIS Related Direct Account Name
		1C1044	MORTON CHALEK
		1S0170	SCHUPAK INVESTMENT C/O HOWARD M SCHUPAK, GEN PART
1S0267	MAURICE SANDLER MD & GLORIA SANDLER REV LIV TRUST	1A0011	HENRIETTA ALBERT TRUST C/O GLORIA SANDLER
		1S0021	MAURICE SANDLER MD & GLORIA SANDLER REV LIV TRUST
1S0268	SANDY SANDLER	1S0024	S ALAN SANDLER SANDY M SANDLER AND LORI B SANDLER
1S0295	ADELE SHAPIRO	101936	ESTATE OF MICHAEL SHAPIRO
		1S0063	ADELE SHAPIRO
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
1S0296	DAVID SHAPIRO	101936	ESTATE OF MICHAEL SHAPIRO
		1K0011	DAVID SHAPIRO NOMINEE 4
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
1S0297	DAVID SHAPIRO NOMINEE	101936	ESTATE OF MICHAEL SHAPIRO
		1S0063	ADELE SHAPIRO
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION

Column 1 **Column 2** **Column 3** **Column 4**

Indirect BLMIS Account No.	Indirect BLMIS Account Name	BLMIS Related Direct Eligible Account No.	BLMIS Related Direct Account Name
1S0298	DAVID SHAPIRO NOMINEE #2	101936	ESTATE OF MICHAEL SHAPIRO
		1S0063	ADELE SHAPIRO
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
1S0299	DAVID SHAPIRO NOMINEE NOMINEE #3	101936	ESTATE OF MICHAEL SHAPIRO
		1S0063	ADELE SHAPIRO
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0066	DAVID SHAPIRO NOMINEE #2
		1S0067	DAVID SHAPIRO NOMINEE NOMINEE #3
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
1S0301	DEBORAH SHAPIRO	101936	ESTATE OF MICHAEL SHAPIRO
		1S0062	DEBORAH SHAPIRO #2
		1S0064	DAVID SHAPIRO
		1S0065	DAVID SHAPIRO NOMINEE
		1S0068	DEBORAH SHAPIRO
		1S0073	SUSAN & MICHAEL SHAPIRO MEMORIAL FOUNDATION
1S0316	SAGE REALTY C/O LILLIAN SAGE	101904	MAURICE SAGE TRUST
		1S0004	SAGE ASSOCIATES C/O LILLIAN SAGE
1S0324	ROBERTA SCHWARTZ TRUST U/A/D 2/11/08	1A0016	GERTRUDE E ALPERN AS TRUSTEE U/A DATED 3/20/90
		1A0025	PAUL ALPERN AS TRUSTEE U/A DATED 3/20/90
		1S0049	DOROTHY S SCHWARTZ
		1S0052	ROBERTA SCHWARTZ
1S0353	LAURA ANN SMITH REVOCABLE TRUST	101959	RHODA SMITH IRREVOCABLE TRUST DATE 5/2/78 GEORGE SMITH TST

Column 1	Column 2	Column 3	Column 4
Indirect BLMIS Account No.	Indirect BLMIS Account Name	BLMIS Related Direct Eligible Account No.	BLMIS Related Direct Account Name
		1S0115	GEORGE SMITH REVOCABLE TRUST GEORGE SMITH TRUSTEE
		1S0116	REGINA SMITH TRUSTEE U/A/D 12/2/96
		1S0117	LAURA ANN SMITH
		1S0120	ROBERT W SMITH
1S0370	ROBERT B SEDGWICK AND NICHOLAS J SEDGWICK TIC	1H0022	BEN HELLER
1S0516	ALVIN E SHULMAN POUROVER TRUST ALVIN E SHULMAN AS TRUSTEE APT #722	1S0077	ALVIN E SHULMAN REVOCABLE TRUST
		1S0078	FLORENCE W SHULMAN REVOCABLE TRUST
1S0517	FLORENCE SHULMAN POUROVER TST FLORENCE W SHULMAN TRUSTEE APT #722	1S0077	ALVIN E SHULMAN REVOCABLE TRUST
		1S0078	FLORENCE W SHULMAN REVOCABLE TRUST
1S0547	SAGE ASSOCIATES C/O LILLIAN SAGE	101904	MAURICE SAGE TRUST
		1S0004	SAGE ASSOCIATES C/O LILLIAN SAGE
1T0004	DORON TAVLIN TRUST DORON A TAVLIN AND HARVEY KRAUSS ESQ TRUSTEES	102611	REBECCA ZAID C/O TAVLIN
		1T0005	AHUUA ZAID I/T/F DORAN TAVLIN &/OR RYAN TAVLIN PO B 2123
1T0036	RYAN TAVLIN TRUST UA 10/31/96 DORON A TAVLIN AND HARVEY KRAUSS ESQ TRUSTEES	102611	REBECCA ZAID C/O TAVLIN
		1T0005	AHUUA ZAID I/T/F DORAN TAVLIN &/OR RYAN TAVLIN PO B 2123
1U0017	GUNTHER UNFLAT & MARGARET UNFLAT J/T WROS	1U0004	GUNTHER UNFLAT & MARGARET UNFLAT J/T WROS

Exhibit B

Column 1

Column 2

Direct BLMIS Account No.	BLMIS Account Name
1B0022	AARON BLECKER
1E0111	BARBARA ENGEL
1H0022	BEN HELLER